

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

AFT MICHIGAN,

Plaintiff,

v.

Civil Case No. 17-cv-13292
Honorable Linda V. Parker
Honorable Elizabeth A. Stafford

PROJECT VERITAS,
and MARISA L. JORGE,
a/k/a MARISSA JORGE, a/k/a
MARISSA PEREZ,

Defendants.

DEFENDANTS' LAY AND EXPERT WITNESS LIST

Defendants, Project Veritas and Marisa L. Jorge, by and through their counsel, respectfully submit the following list of potential witnesses to be called at trial:

LAY WITNESSES:

Defendants have not yet filed an Answer or any Affirmative Defenses. As such, what defenses they may raise are as of this time still yet to be ascertained, and thus which Witnesses they will call are at this time unknown. Notwithstanding the foregoing, Defendants are able, at this time, to list the following individuals who may be called as witnesses at trial:

1. Ms. Marisa Jorge.

2. Mr. James O’Keefe.
3. Mr. Joe Halderman.
4. Mr. Will Keiper.
5. Mr. Fredy Mfuko.
6. Mr. Nico Degregorio.
7. Mr. Ryan Lopez.
8. Mr. Gaz Thomas.
9. Mr. Samuel Chamberlain.
10. Mr. Ian Robinson.
11. Ms. Korima McConer.
12. Mr. David Hecker.
13. Mr. David Dobbie.
14. Mr. Johnny Mickles.
15. Mr. Nate Walker.
16. Mr. Charles “Chuck” Lobaito.
17. Ms. Nikhol Atkins.
18. Ms. Taylor Monday.
19. Ms. Julie Rowe.
20. Ms. Randi Weingarten.
21. Dr. Christian Nwamba, Ph.D.

22. Ms. Ashley Aidenbaum.
23. Ms. Sonya Alvarado.
24. Mr. Brandon Boswell.
25. Ms. Alyssa Brookbank.
26. Mr. Jon Curtiss.
27. Mr. Will Daniels.
28. Ms. Agatha Dier.
29. Mr. Dan Kukuk.
30. Mr. Terrence Martin.
31. Ms. Christy McGillvray.
32. Ms. Alycia Merriweather.
33. Ms. Rachal Osman.
34. Ms. Edna Reaves.
35. Ms. Rickia Robertson.
36. Mr. Tom Schmida.
37. Ms. Christine Sipperley.
38. Mr. Kevin Smith.
39. Ms. Gail Spencer.
40. Ms. Jessica Vanderbrook.
41. Mr. Gary Wellnitz.

42. Ms. Karen Whittler.
43. Ms. Lauren Windsor.
44. Ms. Yael Bromberg.
45. Mr. Aderson Francois.
46. Mr. Robert Creamer.
47. Mr. Joseph Sandler
48. Ms. Dara Lindenbaum
49. Mr. Mike Lux.
50. Mr. Ken Nowak.
51. Ms. Maria Blistan.
52. Mr. Sean Spiller.
53. Mr. Steve Beatty.
54. Mr. Brad Woodhouse, Americans United for Change.
55. Other employees, agents, representatives, corporate designees, or keepers of the records of Project Veritas.
56. Other employees, agents, representatives, corporate designees, or keepers of the records of AFT-Michigan.
57. Other employees, agents, representatives, corporate designees, or keepers of the records of the American Federation of Teachers, AFL-CIO.

58. Employees, agents, representatives, corporate designees, or keepers of the records of the Skillman Foundation.

59. Employees, agents, representatives, corporate designees, or keepers of the records of the Walbridge Foundation.

60. Employees, agents, representatives, corporate designees, or keepers of the records of any third-parties or non-party organizations or companies with information relevant to the above-captioned matter.

61. Any witnesses needed to rebut any allegations raised by Plaintiff or any other parties or witnesses throughout this action.

62. Any witnesses needed to authenticate documents or other evidence.

63. Any and all individuals named in Plaintiff's Witness List (both Lay Witnesses and Expert Witnesses).

64. All individuals identified in the course of discovery, depositions, in written documents produced, in any motion or deposition exhibits, or otherwise named or referenced in any investigation into this matter.

65. Discovery is ongoing. Moreover, Defendants have not yet filed an Answer or Affirmative Defenses, nor has the time to do so yet ran. Defendants, therefore, reserve the right to supplement this list and to offer the testimony of additional or alternative witnesses for Defendants' case in chief, for their defense, for rebuttal, or for any other purposes.

EXPERT WITNESSES

1. Mr. J. Stott Matthews, Spectrum Computer Forensics and Risk Management, LLC.
2. Any rebuttal expert witnesses necessary to rebut any expert testimony provided by or offered by Plaintiff.
3. Discovery is ongoing. Moreover, Defendants have not yet filed an Answer or Affirmative-Defenses, nor has the time to do so yet ran. Defendants, therefore, reserve the right to supplement this list and to offer the testimony of additional or alternative expert witnesses in their case in chief, for their defense, for rebuttal, or for any other purposes.

Respectfully submitted,

/s/ Paul M. Mersino

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Attorneys for Defendants

Dated: April 1, 2019

CERTIFICATE OF SERVICE

I hereby certify that on April 1, 2019, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all registered ECF participants listed for this case.

Respectfully submitted,

/s/ Paul M. Mersino

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